

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

JEFFREY D. HILL,  
Plaintiff

V.

NEW CASTLE COUNTY, a municipal corporation, SGT. ANDREA HYDEN, in her individual capacity; CAPT. MARK HITCH in his individual capacity; and CAPT. QUINTON WATSON, in his individual capacity,  
Defendants

C.A. No. 07-228 (GMS)

## JURY TRIAL DEMANDED

**NEW CASTLE COUNTY**, a municipal corporation, SGT. ANDREA HYDEN, in her individual capacity; CAPT. MARK HITCH in his individual capacity;

**MARK HITCH** in his individual capacity,  
and **CAPT. QUINTON WATSON**,  
in his individual capacity,

## **Defendants,**

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Defendants, New Castle County, Sgt. Andrea Hyden, Capt. Mark Hitch and Capt. Quinton Watson through their undersigned counsel, respectfully move for summary judgment on all counts of the Complaint of Plaintiff Jeffrey D. Hill. The grounds for this Motion are set forth in the Opening Brief in Support of Defendants Motion for Summary Judgment, which is filed separately.

## NEW CASTLE COUNTY LAW DEPARTMENT

/s/ *Megan Sanfrancesco*

Megan Sanfrancesco, (I.D. No. 3801)

First Assistant County Attorney

New Castle County Law Department

New Castle Co.  
87 Reads Way

37 Reads Way  
New Castle County Delaware 19720

New Castle Co.  
(302) 395-5130

*Attorney for Defendants Capt. Mark Hitch, Capt. Quinton Watson, Sgt. Andrea Hyden and New Castle County*

DATED: July 15, 2008